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RASIER, LLC; and RASIER-CA, LLC

[Additional Counsel Listed on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DECLARATION OF VERONICA
GROMADA IN SUPPORT OF
DEFENDANTS' STATEMENT IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATION MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL [ECF No. 1554]**

Judge: Hon. Lisa J. Cisneros
Courtroom: G – 15th Floor

DECLARATION OF VERONICA GROMADA IN SUPPORT OF DEFENDANTS' STATEMENT IN SUPPORT OF
PLAINTIFFS' ADMINISTRATION MOTION TO CONSIDER WHETHER ANOTHER PARTY'S MATERIAL
SHOULD BE FILED UNDER SEAL [ECF NO. 1554]

Case No. 3:23-MD-3084-CRB

1 I, Veronica Gromada having personal knowledge of the following state:

2 1. I am a partner at the law firm of Shook, Hardy & Bacon LLP, attorneys of record for
3 Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC, (collectively, “Uber”). I am
4 a member in good standing of the Bar of the State of Texas and admitted *pro hac vice* in this litigation.
5 I know the following facts to be true of my own knowledge, except those matters stated to be based
6 on information and belief, and if called to testify, I could competently do so. I respectfully submit this
7 declaration in support of Uber’s Statement in Support of Plaintiffs’ Administrative Motion to Consider
8 Whether Another Party’s Material Should Be Filed Under Seal [ECF No. 1554].

9 2. I have reviewed Exhibit E to Plaintiffs’ letter brief regarding their subpoena to the
10 Chertoff Group (ECF 1549-6). It is a report by the Chertoff Group entitled *An Evaluation of Safety*
11 *Incident Categorization Capabilities for Uber*, dated December 3, 2019. The report details Chertoff’s
12 strategic-level evaluation of Uber’s application of an independently-developed sexual harassment,
13 sexual misconduct, and sexual assault taxonomy to its U.S. rideshare platform incident data set and its
14 classification of incidents of physical assault or theft and robbery that result in fatality. Uber produced
15 this document in this litigation, Bates stamped as “UBER-MDL3084-DFS000426873” through
16 “UBER-MDL3084-DFS000426905,” and designated as “CONFIDENTIAL.” The Exhibit contains
17 highly confidential, sensitive non-public information. This document contains highly confidential,
18 sensitive non-public information, such as information about Uber’s internal business practices, Uber’s
19 internal policies and practices, and the technology platforms and practices utilized by Uber. By its
20 nature, this document is a report commissioned to study Uber’s internal business processes. On
21 information and belief, Uber has spent resources developing this report and maintains it as
22 confidential. The document itself states that “this document is proprietary and is provided solely for
23 evaluation by Uber, and may not be used by any other entity or for any other purpose without the prior
24 written consent of both Chertoff Group, LLC.”

25 3. I have reviewed Plaintiffs’ unredacted letter brief regarding their subpoena to the
26 Chertoff Group (redacted brief available at ECF 1549). It is a letter brief submitted by Plaintiffs in
27

1 support of a motion to enforce third party subpoena against the Chertoff Group, filed on August 30,
2 2024. It contains direct quotations to the Chertoff Group's Report that is attached as Exhibit E
3 regarding Chertoff's investigation.

4 4. The disclosure of Plaintiffs' unredacted letter brief regarding their subpoena to the
5 Chertoff Group and Exhibit E to Plaintiffs' letter brief could harm Uber's marketplace standing and
6 cause undue harm if publicly disseminated.

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8 I declare under penalty of perjury that the foregoing is true and correct.

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10 Executed on September 6, 2024.

By: /s/ Veronica Gromada

11 Veronica Gromada
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